

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Elite Precision Customs LLC, *et al.*,
Plaintiffs,

v.

The Bureau of Alcohol, Tobacco,
Firearms and Explosives, *et al.*,
Defendants.

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Case No. 4:25-cv-00044

MOTION FOR LEAVE TO FILE REPLY

TO THE HONORABLE MARK T. PITTMAN, U.S. DISTRICT JUDGE:

In this Court’s order setting a briefing schedule on the parties’ cross-dispositive motions in this case, the Court declined to grant Plaintiffs a final reply but invited Plaintiffs to “renew their request for a reply if they so wish” after submission of the Government’s final brief. Order, Doc. 32 at 1 (Apr. 28, 2025). In the Government’s reply, it argues, for the first time, that if Plaintiffs prevail on the merits, this Court should not grant injunctive relief to all members of Plaintiff Firearms Policy Coalition, but only to the individual members who are also plaintiffs to this suit. *See Combined Reply Br. of Defs. in Supp. of Mot. to Dismiss and Opp. to Pls.’ Mot. for Summ. J.*, Doc. 42 at 11–13 (Aug. 13, 2025). Plaintiffs respectfully request leave to file, within 7 days of granting this motion, a 2-page reply limited to that issue. The Government does not oppose this motion.

Dated: August 19, 2025

Respectfully submitted,

By: /s/ David H. Thompson
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CERTIFICATE OF CONFERENCE

On August 19, 2025, counsel for the parties conferred via email on the filing of this motion.

Defendants do not oppose the motion for leave.

/s/ David. H. Thompson
David H. Thompson
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

On August 19, 2025, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all counsel of record.

/s/ David. H. Thompson

David H. Thompson

Counsel for Plaintiffs